

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

HODELL-NATCO INDUSTRIES, INC.)	CASE NO. 1:08 CV 2755
)	
Plaintiff,)	JUDGE WELLS
)	
v.)	<u>CONSENT MOTION FOR AN</u>
)	<u>EXTENSION OF TIME FOR SAP</u>
SAP AMERICA, INC., et al.)	<u>AMERICA, INC. AND SAP AG TO</u>
)	<u>RESPOND TO CO-DEFENDANTS'</u>
Defendants.)	<u>CROSS-CLAIM</u>
)	

Defendants, SAP America, Inc. and SAP AG (collectively referred to herein as the “SAP Defendants”), by and through their undersigned counsel, respectfully request an Order granting the SAP Defendants an extension of time through March 16, 2009, within which to answer or otherwise respond to the cross-claim of Defendants, LSI-Lowery Systems, Inc, and The IBIS Group, Inc. (the “Cross-claim”).

At the present time, the SAP Defendants must respond to the Cross-claim on or before March 12, 2009. The SAP Defendants have been attempting to learn a few additional facts, which are needed to appropriately respond to the Cross-claim.

The SAP Defendants respectfully make this request in good faith, not for the purposes of delay, and in the interests of judicial economy. The Court has granted the SAP Defendants one prior extension of 16 days to respond the Cross-claim.

Further, counsel for the SAP Defendants has informed counsel for LSI that it anticipates acquiring the additional facts needed to formulate a response to the Cross-claim on or before March 16, 2009. Counsel for LSI has consented to the extension.

The SAP Defendants respectfully request that this Motion be granted and that March 16, 2009 be ordered as the new deadline for the SAP Defendants to answer or otherwise respond to the Cross-claim.

Respectfully submitted,

/s/Leo M. Spellacy, Jr., Esq.

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CERTIFICATE OF SERVICE

I hereby certify that on March 12, 2009 a copy of foregoing was filed electronically.

Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail.

Parties may access this filing through the Court's system.

Respectfully submitted,

/s/ Leo M. Spellacy, Jr.

One of the Attorneys for Defendants SAP America,
Inc. and SAP AG